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March 31, 2021

**Via ECF**

Hon. Jessica S. Allen, USMJ  
U.S. District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
Newark, NJ 07101

Re: Dorsainvil v. Peim, et al.  
Case No. 2:15-cv-3035-ES-JAD

Dear Judge Allen:

This office represents defendants, Carol Gallagher and Alejandrina Sumicad (jointly “Defendants”), in the above-referenced matter. Please accept this letter as the parties’ joint status report, submitted in accordance with the Court’s Text Order filed February 1, 2021. See Doc. No. 82. The current fact discovery deadline is April 27, 2021. To date, the parties are in the process of completing written discovery. Once written discovery is exchanged, the parties’ depositions will be noticed. As additional time is needed to schedule depositions once written discovery is completed, the parties respectfully request a forty-five (45) day extension of the discovery end date, until June 11, 2021.

Thank you Your Honor for your attention to this matter

Respectfully,

s/Candice H. Rienzo

Candice H. Rienzo

cc: All Counsel via ECF